

THE HONORABLE MARY JO HESTON

Chapter 13

Date of Hearing: March 29, 2021

Time of Hearing: 1:00 PM

Hearing Location: Telephonic

Response Due: March 22, 2021

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

In re

SARAH HOOVER,

Debtor.

Chapter 13

Case No.: 19-42890-MJH

Adversary No.: 20-04002-MJH

SARAH HOOVER,

Plaintiff,

vs.

QUALITY LOAN SERVICE
CORPORATION OF WASHINGTON,
PHH MORTGAGE CORPORATION
D/B/A PHH MORTGAGE SERVICES,
HSBC BANK USA, N.A., AS TRUSTEE
OF THE FIELDSTONE MORTGAGE
INVESTMENT TRUST, SERIES 2006-2,
NEWREZ, LLC, AND IH6 PROPERTY
WASHINGTON, L.P. D/B/A
INVITATION HOMES

Defendants.

**DEFENDANTS' MOTION TO
EXTEND DEADLINE TO FILE
REPLY IN SUPPORT OF MOTION
TO STAY PROCEEDINGS PENDING
APPEAL**

DEFENDANTS' MOTION TO EXTEND DEADLINE TO FILE REPLY IN
SUPPORT OF MOTION TO STAY PROCEEDINGS PENDING APPEAL
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I. MOTION

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants PHH Mortgage Corporation D/B/A PHH Mortgage Services; NewRez, LLC (individually, “NewRez”); and HSBC Bank USA, N.A., as Trustee of the Fieldstone Mortgage Investment Trust, Series 2006-2 (individually the “Trust”) (collectively, “Defendants”) hereby move for an Order enlarging by one day the time in which it must file a Reply in Support of its Motion to Stay Proceedings Pending Appeal (Doc. 95), so that the Reply is due March 25, 2021.

At the last hearing in this matter, the upcoming hearing on Defendants’ Motion to Stay was moved from April 8, 2021 to March 29, 2021 to accommodate a request from Plaintiff to hold the hearing at the soonest possible time. At this same time, this Court requested Defendants include, with their reply brief in support of the Motion to Stay, briefing on whether discovery should be reopened if there is no stay, and what discovery is needed at this juncture. Due to the change of hearing date, Defendants’ deadline to file a reply and further briefing requested by this Court was shortened so that the deadline fell only two-days after the late-night receipt of Plaintiff’s briefing. Defendants’ counsel therefore conferred with Plaintiff’s counsel on this request for an extension, and the parties agreed on an extension of one day.

Accordingly, for good cause appearing, Defendants request this Court extend its deadline to file a reply to March 25, 2021. The motion is not made for the sole purpose of delay, and no party is prejudiced by the extension.

II. CONCLUSION

For the foregoing reasons, Defendants request a one-day extension on their deadline to file a Reply in Support of Motion to Stay Proceedings Pending Appeal.

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1 DATED: March 24, 2021

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7 *Attorneys for Defendants PHH Mortgage*
8 *Corporation, HSBC Bank USA, N.A., as*
9 *Trustee of the Fieldstone Mortgage*
10 *Investment Trust, Series 2006-2, and*
11 *NewRez, LLC*
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DEFENDANTS' MOTION TO EXTEND DEADLINE TO FILE REPLY IN
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CERTIFICATE OF SERVICE

On March 24, 2021, I served the foregoing document(s): DEFENDANTS' MOTION TO EXTEND DEADLINE TO FILE REPLY IN SUPPORT OF MOTION TO STAY PROCEEDINGS PENDING APPEAL, in the manner described below:

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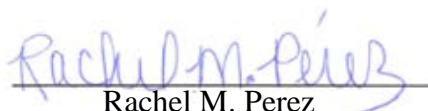
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 24, 2021


Rachel M. Perez